

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	No. 3:22-cr-339
v.	:	
	:	(Mariani, J.)
MATTHEW ROBINSON,	:	
Defendant	:	

MOTION TO SCHEDULE PLEA HEARING

AND NOW, the United States of America, by its undersigned counsel, submits the following Motion to Schedule Plea Hearing. In support of this motion the government alleges as follows:

1. On September 26, 2022, an Information was filed charging Robinson with Attempted Enticement of a Minor, in violation of 18 U.S.C. § 2422 (b). The parties simultaneously filed a plea agreement, whereby Robinson agreed to plead guilty. (Doc 19).
2. The case was assigned to the Honorable Robert D. Mariani.
3. Counsel for the government has contacted counsel for the defendant, Joseph G. McGraw, Esq., who does not oppose the motion.

WHEREFORE, for the reasons stated herein, the government

respectfully requests that this Honorable Court grant the government's Motion to Schedule Plea Hearing.

Date: August 10, 2023

Respectfully submitted,

/s/ Phillip J. Caraballo
PHILLIP J. CARABALLO
Assistant United States Attorney
William J. Nealon Federal Building
235 N. Washington Ave., Suite 311
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NY 4590816

CERTIFICATE OF CONCURRENCE

I, Assistant U.S. Attorney Phillip J. Caraballo, certify that I have contacted Joseph G. McGraw, Esquire, counsel for the defendant, who does not oppose the government's motion.

Date: August 10, 2023

/s/ Phillip J. Caraballo
PHILLIP J. CARABALLO
Assistant United States Attorney
William J. Nealon Federal Building
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on August 10, 2023, she served a copy of the attached:

MOTION TO SCHEDULE PLEA HEARING

by ECF, to Joseph G. McGraw, Esquire

/s/ Terri L. Pendolphi
Terri L. Pendolphi
Legal Assistant